

**UNITED STATES DISTRICT COURT**

Western District of Washington

**Kimsey et.al. vs. City of Sammamish et.al.**

Case No. 2:21-cv-01264-MJP

**Declaration of Celia Wu**

I, Celia Wu, declare as follows:

1. I declare that Ms. Kate Langsford and Ms. Sarah Hawes Kimsey made false claims in their court filings in Case 2:21-cv-01264-MJP. This declaration serves to notify Ms. Kimsey, Ms. Langsford, and the City of Sammamish that I am creating an official record of their false claims and defamatory actions against me in this case's court records.
2. Ms. Langsford, in a Complaint for Damages filed with the Superior Court of the State of Washington on October 21, 2021, and again in a Declaration to the U.S. Western District Court on November 5, 2021, falsely claimed that I deleted Ms. Sarah Hawes Kimsey's comments on the City of Sammamish's Facebook page.
3. On August 26, 2024, I sent Ms. Langsford a request for retraction (attached).
4. Ms. Kimsey, in a sworn declaration made on November 5, 2021, to the U.S. Western District Court, falsely claimed that I violated her First Amendment rights by deleting comments she made on the City of Sammamish's Facebook page.
5. On September 18, 2023, my attorney sent a Request for Retraction, Correction, and Clarification of Defamatory Statements to Ms. Kimsey (attached).
6. The evidence in the court documents makes clear that I did not delete, nor hide, Ms. Kimsey's comments, and there was no Court decision or finding that I deleted or hid Ms. Kimsey's comments.
7. An affidavit from the COO of Archive Social verified that the comments Ms. Langsford and Ms. Kimsey falsely claimed I deleted were still visible on the City of Sammamish's Facebook page. He further clarified that "once a comment is deleted on Facebook, it is also deleted from their servers and backup systems so that it cannot be retrieved" (attached).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on October 11, 2024, at Sammamish, Washington.

---



Celia Wu

**Celia Wu**  
Sammamish, WA 98074  
Email: celiachongwu@gmail.com

August 26, 2024

**Katherine Langsdorf**  
Email: [kate.langsdorf@bothellwa.gov](mailto:kate.langsdorf@bothellwa.gov) and via Certified Mail

Dear Ms. Langsdorf,

**Re: False Statements Submitted in Complaint for Damages**

I am writing to address a grave matter concerning false statements you made in a court document you filed with the Superior Court of the State of Washington on October 21, 2021.

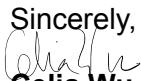
Specifically, you falsely claimed multiple times that I deleted Ms. Sarah Hawes Kimsey's comments on the City of Sammamish's Facebook page. I have evidence, in the form of a Declaration from Robert Sydnor, the COO of ArchiveSocial, executed on October 27, 2021, confirming that Ms. Kimsey's comments were never deleted and remain accessible to the public on the City of Sammamish's Facebook page.

As you are undoubtedly aware, submitting false statements in a court document constitutes perjury under Washington State law (RCW 9A.72.020). Perjury is a serious criminal offense, punishable by law, as it undermines the integrity of the judicial system. The statute of limitations for perjury in Washington State is three years, which means that this matter remains well within the time frame for legal action to be taken against you.

Your knowingly false statements have not only caused harm to my reputation but have also misled the court. Such actions are unacceptable and warrant immediate correction.

I hereby demand that you formally retract these false statements in writing and submit a corrected document to the court where the original false claims were made. Additionally, I request that you provide a copy of the retraction to me and supply the retraction to any news outlets that covered this matter, including the *Sammamish Independent*. You must do so within 14 days from the date of this letter. If you fail to comply, I will be left with no choice but to pursue all available legal remedies, including but not limited to filing a criminal complaint for perjury and a civil lawsuit for defamation.

Please take this matter seriously and consider the potential legal consequences of your actions. I strongly urge you to rectify this situation promptly to avoid further escalation.

Sincerely,  
  
**Celia Wu**

LAW OFFICES OF  
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**WE LISTEN**

PHONE (206) 587-2700

MARY RUTH MANN, ATTORNEY

ADMITTED IN  
STATE AND FEDERAL COURTS  
mrmann@mannkytle.com

September 18, 2023

*VIA Email*

Sarah Hawes Kimsey  
[sarahkimsey@hotmail.com](mailto:sarahkimsey@hotmail.com)

**RE: Celia Wu - Request for Retraction, Correction and Clarification of  
Defamatory Statements Under RCW 7.96.040**

Ms. Kimsey:

We are writing this Request for Retraction and/or Correction and/or Clarification to you and anyone who participated in the publication of information described herein. It contains a Request for Retraction, Correction and Clarification and is served on you on behalf of Celia Wu, about whom you have made oral and written statements which are alleged to be defamatory and had defamatory meaning about Ms. Wu. At the time of the initial defamation identified herein, Ms. Wu was a Communications Manager, for the City of Sammamish.

We have information that the content of your statements has been false and/or carried false meaning, and that the statements have harmed Celia Wu including but not limited to damage to her reputation, and employment but also causing her humiliation, suffering, embarrassment, loss of enjoyment of life, and great emotional distress. Your actions and defamatory statements are also alleged to have violated other statutes and caused her symptoms of severe anxiety, pain and suffering; have caused her economic loss and have caused her to incur attorney fees and other costs.

On information and belief we have a concern that your defamatory statements were intended to do her economic harm and to tortiously interfere with her employment and contractual expectations; and that a substantial factor in such intent was that the Communications team was made up of two highly qualified women of color, whom you

publicly misrepresented as “woefully unqualified,” (See Exhibit 12) and represented as having “Trumpian Politics.” You further continually denigrated and attacked Ms. Wu publicly on social media, including the purchase of Facebook ads to spread falsehoods about Ms. Wu (**Exhibits 4, 5, 6, 9, 10, 11, 16**). You falsely represented that she had deleted your public comments on the City of Sammamish’s Facebook page, which false comments, taken together, would damage her and hold her up to derision across the State of Washington.

We set forth here the oral and written statements attributed to you which you must immediately retract and/ or correct in the same media made<sup>1</sup>, including but not limited to social media, blogs, and publications, or be subject to the consequences of RCW 7.96.010 et. seq. for Failure to Correct Defamation.

a) Ms. Wu contends that you made the following statements, and specifies with particularity the statements alleged to be false and defamatory or otherwise actionable and, to the extent known, the time and place of publication, and the meaning, and that you communicated them to others who repeated them further:

1. Claimed orally and in writing that you “won” a lawsuit, claiming that you prevailed regarding Ms. Wu having deleted your First Amendment Emails which Ms. Kimsey had posted, when in fact the Court found that 56 of 59 emails which were claimed to be deleted were in fact still visible on the City of Sammamish’s Facebook page; (**Exhibits 1, 2, 7 and 8**)

2. Claiming on March 27, 2022 on the open and public Facebook group, Sammamish Central, “Ms. Wu should be fired (Exhibit 2) when Ms. Kimsey knew that the comments were still visible on the Facebook page operated by the City.

3. On January 3, 2021, posted on a Democratic Facebook group defaming Ms. Wu that she should not be in leadership of a local democratic party organization, falsely accusing Ms. Wu of violating First Amendment rights.

4. On May 18, 2022, the Sammamish Independent quotes Ms. Kimsey’s calling for Ms. Wu’s firing : *“In a March 27 Facebook comment thread, Kimsey called for city communications manager Celia Wu to be fired, a sentiment that Amies also agreed with.”* (**Exhibit 18**)

b) The further evidence of the defamation and statements and knowledge are as follows:

1. Sarah Hawes Kimsey in a declaration **Exhibit 19** alleges that her comments on the City of Sammamish’s Facebook page were deleted. City Defense Attorney

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<sup>1</sup> Including but not limited to the following publications where the comments were made or repeated or referenced: The Sammamish Independent. The Sammamish Comment, I Love Sammamish, The Seattle Times, Facebook pages and groups, Sammamish Central, Sammamish Progressives, City of Sammamish page, 45th District Democrats, Twitter / X

Jessica Goldman's declaration includes an email to Kimsey's attorney that the comments referenced in the complaint are visible to her. Hence, Ms. Kimsey and her attorneys knew her comments were not deleted. *Exhibit 20*.

2. Celia Wu's declaration (*Exhibit 21*) and accompanying exhibits (*Exhibit 22*) hereto confirm that Ms. Kimsey's comments were not deleted and supply screenshots of her comments still visible on the City's Facebook page.
3. Ms. Kimsey in a sworn privileged declaration on November 5, 2021 date continued to adhere to the defamation despite knowledge that the comments were not deleted and still visible on the City's Facebook page. (*Exhibit 23*)
4. The Court Order (*Exhibit 1*) confirms that Ms. Kimsey's allegations that her comments were deleted were false and that her comments were still visible. The Court found 56 of 59 comments alleged to have been deleted from the City of Sammamish's Facebook Page by Ms. Wu were never in fact deleted and were still visible on the City of Sammamish's Facebook page. Kimsey continued to contend her comments had been deleted by Ms. Wu and that she had WON the lawsuit and that Ms. Wu should be fired.

c) The defamatory statements have resulted in the following harmful circumstances to Ms. Wu and her colleague, stemming from the defamatory meaning of Ms. Kimsey's comments:

1. A hostile work environment, as some councilmembers and the interim city manager "weaponized" these falsehoods to isolate and denigrate Ms. Wu. These falsehoods threatened Ms. Wu's ability to serve the community in her public service role.
2. Harm to Ms. Wu's reputation, affecting her employment and personal opportunities. As a journalist, and a citizen and active volunteer in King County being falsely accused of infringing upon First Amendment rights is extremely harmful to her reputation as a professional and citizen advocate.
3. Kimsey's campaign to get Celia Wu "fired" based on these allegations, caused further harm to Wu's reputation and ability to sustain her employment and to find new employment.
4. A former mayor, Don Gerend, posted on Facebook group two comments (that we are aware of) endangering Ms. Wu's employment. (*Exhibits 3, 3a*)
5. Tom Odell, who was a Councilmember at this time, weaponized the false allegations about Ms. Wu supposedly improperly deleting comments, in two emails to an attorney investigating the previous City Manager. (*Exhibits 13, 14*)
6. The other two co-plaintiffs in the Kimsey lawsuit also disparaged Ms. Wu, "tagging" Democratic party senior leadership and King County Councilmembers. (*Exhibit 3*)

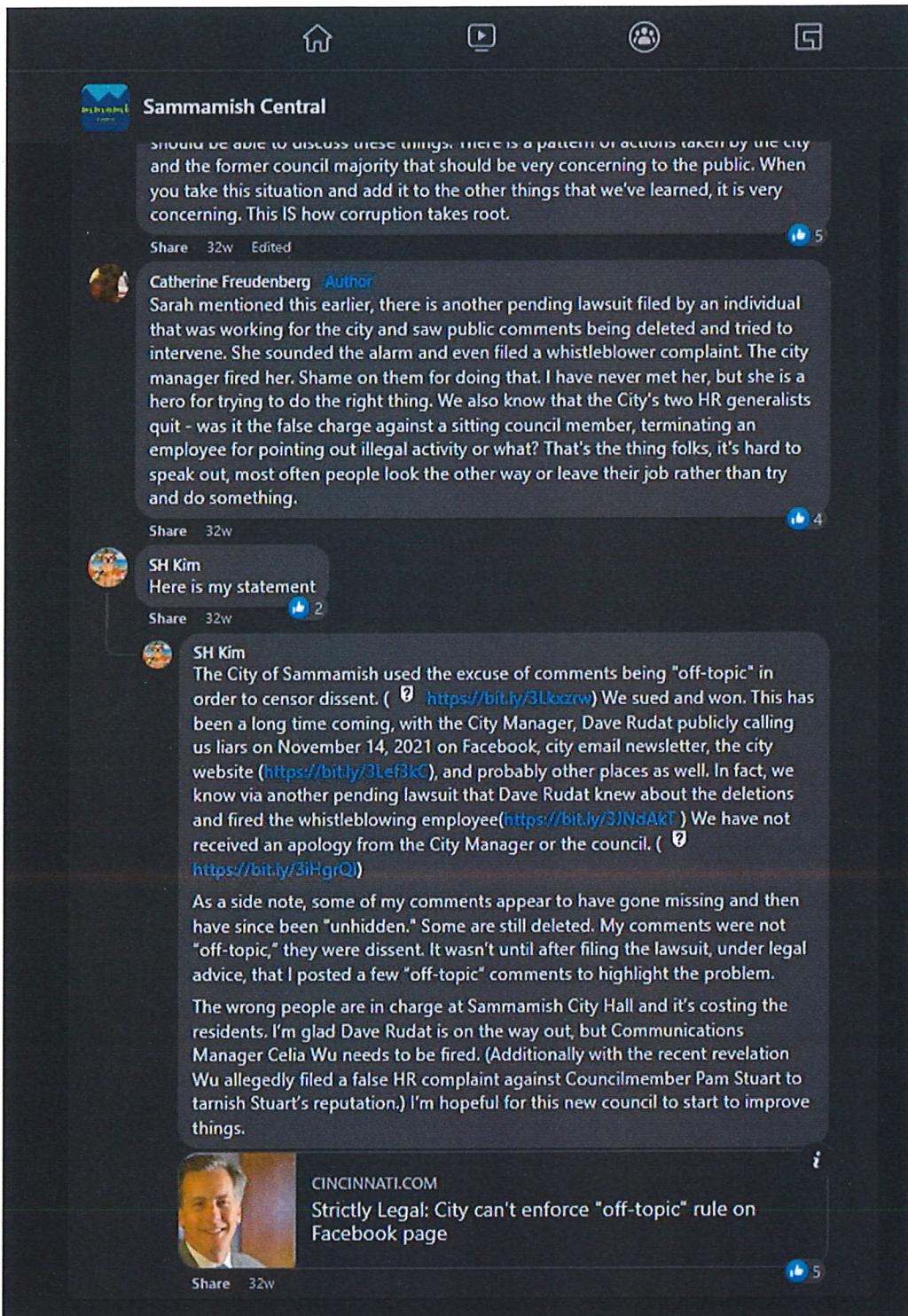
7. Ms. Kimsey has “blocked” Ms. Wu from social media posts, so Ms. Wu would be unaware and cannot see or defend herself from past and future defamation by Ms. Kimsey.
8. Contrary to Ms. Kimsey’s allegations, Ms. Wu is Asian Latina American with nearly four decades working in the media industry and holds a masters in journalism. Fowler is African American with three decades of an award-winning writing and communications experience.
9. Ms. Kimsey’s comments directed at the Communications team at the City of Sammamish harassed and defamed two women of color public servants.
10. Many of these comments were made on the City of Sammamish’s official and public Facebook page, defaming and harassing the two women of color at the height of anti-Asian hate and during a precarious climate for people of color.

(d) Ms. Wu States that the alleged defamatory meanings of the statements are false.

11. City Defense Attorney Jessica Goldman’s declaration (*Exhibit 20*) includes an email to Ms. Kimsey’s attorney that the comments referenced in the complaint are visible to her. Hence, Ms. Kimsey and her attorneys knew her comments were not deleted.
12. Celia Wu’s declaration (Exhibit 21) and accompanying exhibits confirm Kimsey’s comments were not deleted and supply screenshots of her comments still visible on the City’s Facebook page.
13. The Kimsey allegations and comments against Wu combined show malice.

**Further Documentation and Exhibits Follow:**

Kimsey puts on the following statement on Sammamish Central, a public Facebook group, that “Celia Wu needs to be fired”. It is “liked” by five persons, including a former City Council member (Jason Ritchie). *See Exhibit 2. (March 27, 2022)*



**Sammamish Central**

Should be able to discuss these things. There is a pattern of actions taken by the city and the former council majority that should be very concerning to the public. When you take this situation and add it to the other things that we've learned, it is very concerning. This IS how corruption takes root.

Share 32w Edited 5

**Catherine Freudenberg Author**

Sarah mentioned this earlier, there is another pending lawsuit filed by an individual that was working for the city and saw public comments being deleted and tried to intervene. She sounded the alarm and even filed a whistleblower complaint. The city manager fired her. Shame on them for doing that. I have never met her, but she is a hero for trying to do the right thing. We also know that the City's two HR generalists quit - was it the false charge against a sitting council member, terminating an employee for pointing out illegal activity or what? That's the thing folks, it's hard to speak out, most often people look the other way or leave their job rather than try and do something.

Share 32w 4

**SH Kim**

Here is my statement

Share 32w 2

**SH Kim**

The City of Sammamish used the excuse of comments being "off-topic" in order to censor dissent. ( <https://bit.ly/3Lkxrw> ) We sued and won. This has been a long time coming, with the City Manager, Dave Rudat publicly calling us liars on November 14, 2021 on Facebook, city email newsletter, the city website (<https://bit.ly/3LeBkC>), and probably other places as well. In fact, we know via another pending lawsuit that Dave Rudat knew about the deletions and fired the whistleblowing employee(<https://bit.ly/3JNdAkt> ) We have not received an apology from the City Manager or the council. ( <https://bit.ly/3iHgrQI> )

As a side note, some of my comments appear to have gone missing and then have since been "unhidden." Some are still deleted. My comments were not "off-topic," they were dissent. It wasn't until after filing the lawsuit, under legal advice, that I posted a few "off-topic" comments to highlight the problem.

The wrong people are in charge at Sammamish City Hall and it's costing the residents. I'm glad Dave Rudat is on the way out, but Communications Manager Celia Wu needs to be fired. (Additionally with the recent revelation Wu allegedly filed a false HR complaint against Councilmember Pam Stuart to tarnish Stuart's reputation.) I'm hopeful for this new council to start to improve things.

 CINCINNATI.COM  
Strictly Legal: City can't enforce "off-topic" rule on Facebook page

Share 32w 5

On May 18, 2022, the Sammamish Independent quotes Kimsey's calling for Wu's firing:

*"In a March 27 Facebook comment thread, Kimsey called for city communications*

*manager Celia Wu to be fired, a sentiment that Amies also agreed with."*

A former mayor, Don Gerend, posts on Facebook group two comments (that Wu is aware of) endangering Wu's employment.

The other two plaintiffs in the Kimsey lawsuit also disparage Wu "tagging" Democratic party senior leadership and King County councilmembers. **Exhibit 3 and Exhibit 3-A.**

(May 18, 2022)

**Catherine Freudenberg**  
By the way, the employee that intentionally deleted the public records could have faced felony charges if the action was intentional. Considering that a whistleblower reported it, implies that it was intentional. "A state statute, RCW 40.16.020, prohibits municipal and other public officers from mutilating, destroying, concealing, or falsifying any record or paper relating to the officer's office. Violation of the statute is a felony and can result in extremely serious penalties: imprisonment for not more than ten years, a fine of not more than \$5,000, or both a fine and imprisonment. In addition, if the person is an elected official, conviction of a felony vacates his or her office. RCW 42.12.010(5). But wait, there's even more: RCW 9.92.120 provides: The conviction of a public officer of any felony or malfeasance in office shall entail, in addition to such other penalty as may be imposed, the forfeiture of his or her office, and shall disqualify him or her from ever afterward holding any public office in this state. (Emphasis added.) This section disqualifies the person from any governmental office - elective and appointive - forever."

Share 11w

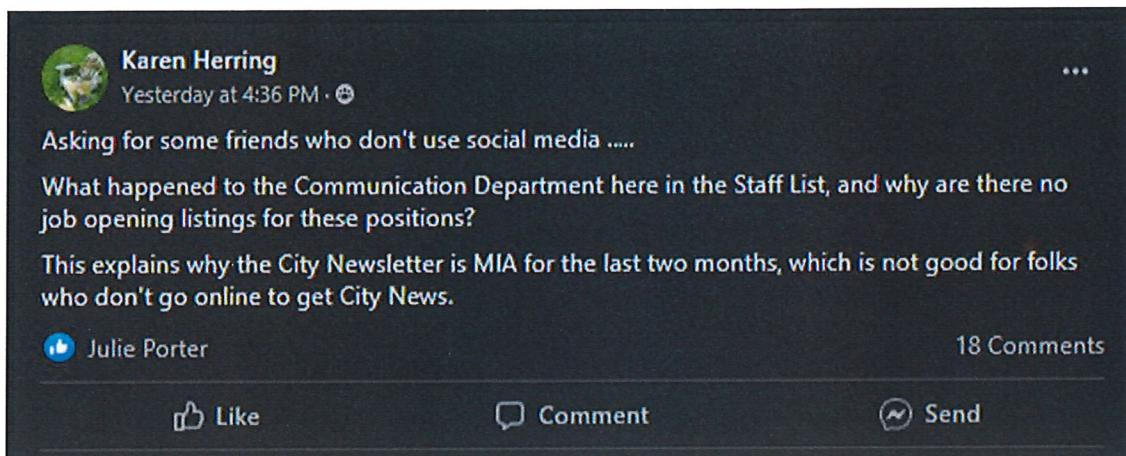
**Don Gerend**  
Do we assume that the employee named in the lawsuit will soon no longer work for the City?

Share 11w

**Tarul Kode**  
41st LD Democrats - Discussion Group 45th District Democrats Group Shasti Conrad Tina Podlodowski Councilmember Girmay Zahilay Claudia Balducci Please note who is named in this suit. There are Dems who need to be held accountable.  
P.S. Ajay Chakrapani

Share 11w Edited

(August 1, 2022)



Karen Herring  
Yesterday at 4:36 PM · 

Asking for some friends who don't use social media ....

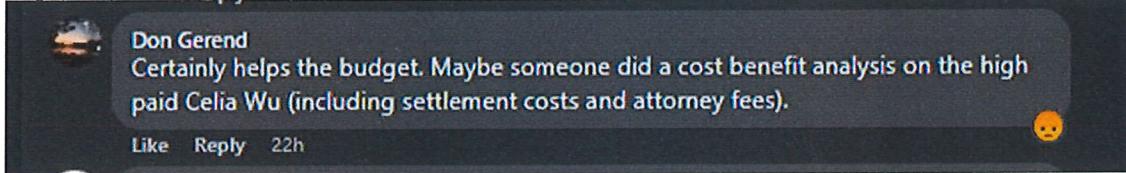
What happened to the Communication Department here in the Staff List, and why are there no job opening listings for these positions?

This explains why the City Newsletter is MIA for the last two months, which is not good for folks who don't go online to get City News.

18 Comments

 Like  Comment  Send

Replies to the post:



Don Gerend  
Certainly helps the budget. Maybe someone did a cost benefit analysis on the high paid Celia Wu (including settlement costs and attorney fees). 

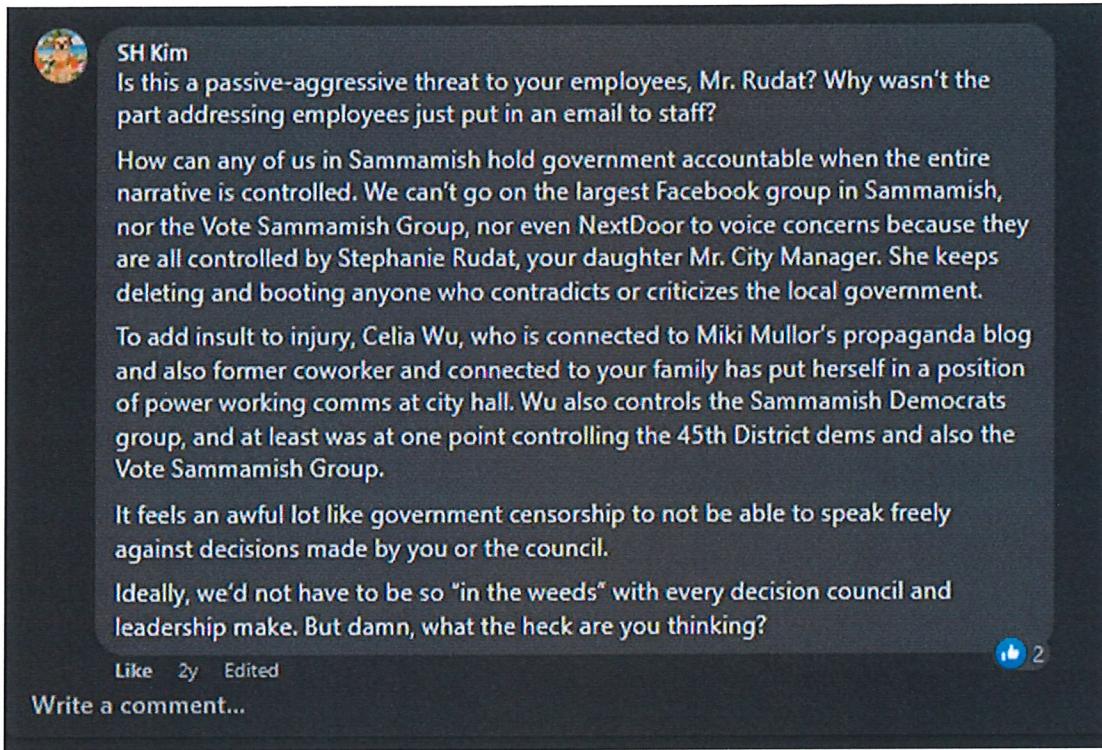
Like Reply 22h

Harassment of minority female public servants

Kimsey has harassed and denigrated the experience of two highly qualified women of color who sought to serve their community in public service. Below are examples that Wu is aware of as Kimsey has “blocked” her from seeing any of her further postings. *See Exhibit 4.*

June 18, 2020

*Kimsey comments on the City of Sammamish's Facebook page, “Celia Wu....has put herself in a position of power working comms at city hall....”*



SH Kim  
Is this a passive-aggressive threat to your employees, Mr. Rudat? Why wasn't the part addressing employees just put in an email to staff?

How can any of us in Sammamish hold government accountable when the entire narrative is controlled. We can't go on the largest Facebook group in Sammamish, nor the Vote Sammamish Group, nor even NextDoor to voice concerns because they are all controlled by Stephanie Rudat, your daughter Mr. City Manager. She keeps deleting and booting anyone who contradicts or criticizes the local government.

To add insult to injury, Celia Wu, who is connected to Miki Mullor's propaganda blog and also former coworker and connected to your family has put herself in a position of power working comms at city hall. Wu also controls the Sammamish Democrats group, and at least was at one point controlling the 45th District dems and also the Vote Sammamish Group.

It feels an awful lot like government censorship to not be able to speak freely against decisions made by you or the council.

Ideally, we'd not have to be so "in the weeds" with every decision council and leadership make. But damn, what the heck are you thinking?

Like 2y Edited

Write a comment...

2

October 16, 2020

Kimsey denigrates Wu on the City of Sammamish's Facebook page, "The unconscionable damage the grossly incompetent Communications Manager at City Hall just did to confidence in our election system was reckless and irresponsible." *See Exhibit 5 and Exhibit 6.*

SH Kim  
Incredibly irresponsible of the city to repeat a rumor at this point. The "whole roadside and ditches thing" is a alt-right talking point used to undermine our mail-in voting system which is very secure. "Bags of ballots" versus "bags of mail that include ballots" are two very different things.

Like 2y Edited

Sue Allison  
Wow! The conspiracy theories are off the charts. This is not a case of voter tampering. This is a case of mail theft. How do I know, I found some ballots and just turned them into the Sammamish Police. A case of ditching the ballots alongside the road.... See more

Like 2y

SH Kim  
Sue Allison Simon The unconscionable damage the grossly incompetent Communications Manager at City Hall just did to confidence in our election system was reckless and irresponsible.

On the official City of Sammamish page they posted that "Sammamish PD have also been called to investigate bags of ballots discovered by roadsides and ditches."

When what PD had stated that "bags of mail including ballots" were discovered.

Two VERY different things.

If you do not receive your ballot by October 19th call King County Elections at 206-296-VOTE or go online to: [kingcounty.gov/elections/obmp](http://kingcounty.gov/elections/obmp).

###

"There is no evidence to support that this was politically motivated, or that ballots were specifically targeted. Sammamish is an area where we have frequent mail and package thefts," Sammamish police said.

<https://www.facebook.com/112779115408517/posts/3960891420597248/?extid=0&d=n>

SITES.OMNIBALLOT.U. [sites.omniballot.us](http://sites.omniballot.us)

Like 2y

Most relevant is selected, so some replies may have been missed...

 Author  
**City of Sammamish - Government**  
The postmaster from Redmond who delivers the mail to Sammamish asked the City to alert its residents; missing ballots found will be re-delivered. Sammamish PD is also attempting to deliver the missing ballots they found. The important thing is for people not to panic, but to call King County (info provided above) or download their ballot by the 19th. This is the only intent of this PSA.

Like 2y  28

 **SH Kim**  
**City of Sammamish - Government** Your "intent" by repeating "Sammamish PD have also been called to investigate bags of ballots discovered by roadsides and ditches." Is to cast doubt on our incredibly secure ballot system in Washington State. "Called to investigate" is NOT a confirmation, it's a rumor.  
It is very clear that you all have no government PIO experience. Get yourselves trained ASAP.  
Instead you could have posted about how secure our system is, how to get a provisional ballot, how to track ballots end-to-end, and instead you lead with fear.

Like 2y Edited   5

October 16, 2020

*Kimsey continues with the attacks on the City of Sammamish's Facebook page, falsely accusing that Wu has "illegally deleted comments and hidden the community tab on the Facebook Page....She doesn't know what she's doing as far as government comms and it's all too apparent". She continues to falsely claim that I "have no government or communications experience....her job is important and it's lost all credibility with her there." Exhibit 7.*

Wu v. Kimsey  
Page 11

SH Kim  
You have posted an incomplete address, Celia. You realize that there are two 801 228th Ave in Sammamish? A NE and a SE?  
What was the point in posting this at 11pm? Do you not know how to schedule posts and check your insights for timing?

Like 2y Edited

Suzi S. Suelze  
I saw this post first thing this morning, for me it was perfect timing (thankfully I know where City Hall is)

Like 2y Edited

Kirsten Omk  
Sarah Hawes Kimsey - I appreciate everything you do for the community. Also, the person who originally posted this is human and a gentle correction is not only nicer to the person who made the mistake with the address, it doesn't add to the endless negativity in our world.

Like 2y

Sarah Stephens  
Sarah Hawes Kimsey Dude, calm down.

Like 2y

SH Kim  
Suzi S. Suelze Yeah, too bad they have now interfered in an election twice in one day now. Yesterday, by undermining our mail-in ballot system and then second, posting an incomplete address. Posting at 11:30pm at night is like pretty much saying you don't want people to see your posts.

Like 2y

SH Kim  
Kirsten Omk Unfortunately, she is part of a select group of folks at city hall who are damaging transparency and morale. She has illegally deleted comments and hidden the community tab on the Facebook page. She feeds information to a local muckraker in town who consistently degrades staff and also is her business partner. She doesn't understand how strict public records are. She doesn't know what she's doing as far as government comms and it's all too apparent. She was placed in a management role by the Rudat family to control the narrative despite having no government or communications experience.

The ACLU recognizes the issues with Sammamish, yet does not have the bandwidth at present to deal with them.

I am beyond frustrated with her (and the leadership at City Hall) and the damage she did yesterday feeding fuel to the anti-mail-in voter fools, used her official post to undermine our election. I don't take any of this lightly. Her job is important and it's lost all credibility with her there.

Like 2y Edited

Most Relevant is selected, so some replies may have been filtered out.

January 3, 2021  
Kimsey denigrates Wu and Wu's professional role as Communications Manager, on the 45th District Democrat's Facebook page. *See Exhibit 8.*

 **Sarah Hawes Kimsey** •  
January 3 at 11:50 AM · 

Celia Wu should not be elected to a leadership position with the 45th district Democrats. I was shocked to hear that she was running for Vice Chair of the 45th District Democrats. In fact, it would be better to leave the position vacant than allow her to serve in this role.

Over the last year Celia has actively campaigned against 45th district Democrat endorsed candidates and has actively campaigned FOR republicans.

Along with Tom O'dell, she attempted to shuttle through a well-established Republican, Christie Malchow, for endorsement with the 45th district Democrats ignoring party endorsement protocols.

Further, in her role as admin for the 45th District Democrats and Sammamish Democrats Facebook pages she has refused and deleted posts regarding Sammamish Politics, Sammamish corruption, and discussion of the appointment of the Sammamish Chief of police as acting city manager during a time in which a Black Lives Matter protest had been planned. An event occurred over this time regarding the chief's behavior is currently under investigation by OLEO.

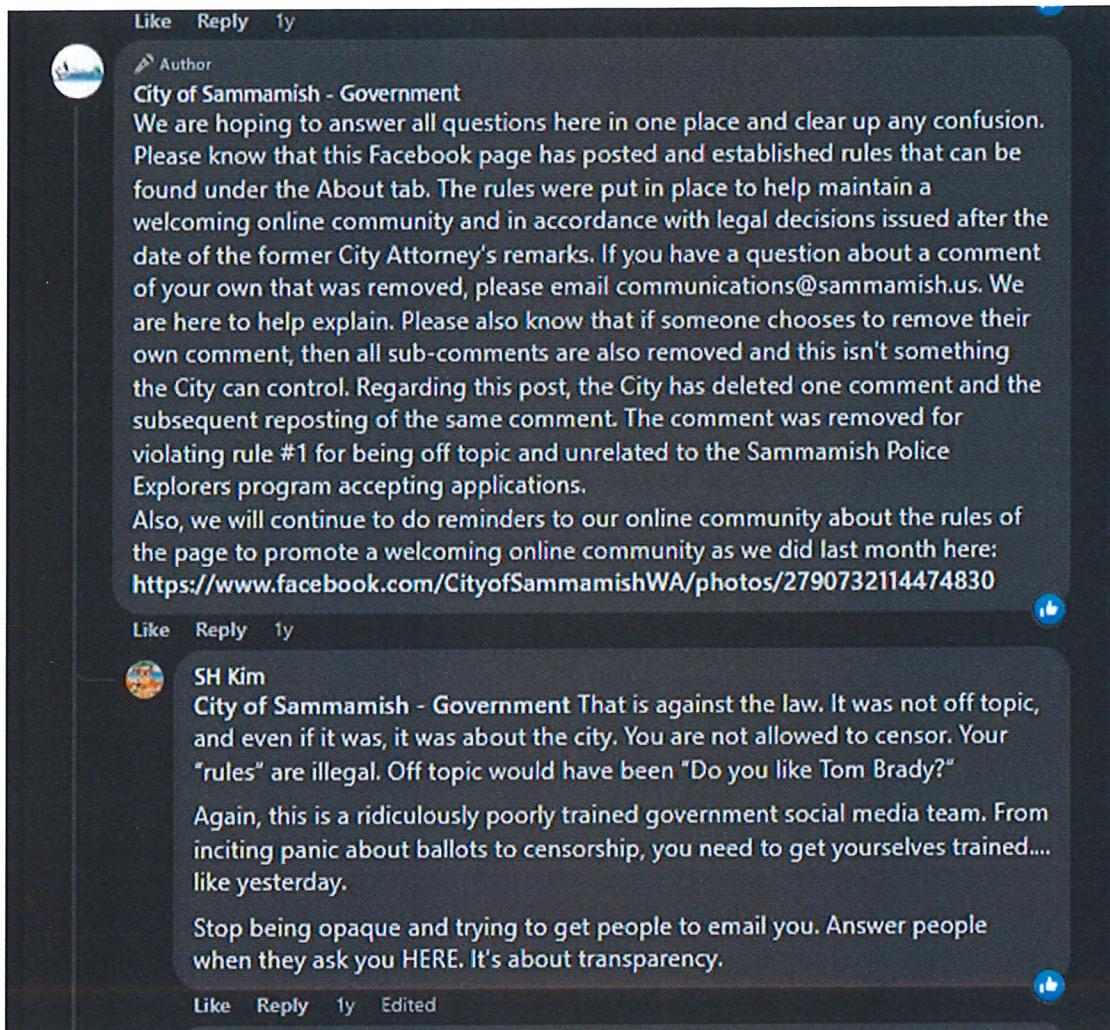
In her role as Communications Manager for the City of Sammamish, she has deleted the entire community post feed, removing dissent, and has removed comments critical of the City government. She has also discontinued posting the City Meetings on the live Facebook feed, one can assume because the way in which the city is being governed has been questioned. This is a first amendment violation, the ACLU is aware, but as I'm sure you can assume, they are quite busy at the moment.

In my opinion, it would be better to leave this position vacant than to allow this sham of a Democrat to be appointed to a leadership position which would permit her in depth access to proprietary data in which Democrats utilize to ensure success in elections. By doing so, I fear that this hands over sensitive information directly into the hands of all the Republicans Celia Wu has supported over the last couple years.

Vote no on Celia Wu. We can do better.

 17 3 Shares

February 11, 2021  
Kimsey on the City of Sammamish's Facebook page defames us and falsely accuses us of censorship: "a ridiculously poorly trained government social media team. From inciting panic about ballots to censorship, you need to get yourselves trained....like yesterday." *See Exhibit 9.*



Like Reply 1y

Author

**City of Sammamish - Government**

We are hoping to answer all questions here in one place and clear up any confusion. Please know that this Facebook page has posted and established rules that can be found under the About tab. The rules were put in place to help maintain a welcoming online community and in accordance with legal decisions issued after the date of the former City Attorney's remarks. If you have a question about a comment of your own that was removed, please email communications@sammamish.us. We are here to help explain. Please also know that if someone chooses to remove their own comment, then all sub-comments are also removed and this isn't something the City can control. Regarding this post, the City has deleted one comment and the subsequent reposting of the same comment. The comment was removed for violating rule #1 for being off topic and unrelated to the Sammamish Police Explorers program accepting applications.

Also, we will continue to do reminders to our online community about the rules of the page to promote a welcoming online community as we did last month here: <https://www.facebook.com/CityofSammamishWA/photos/2790732114474830>

Like Reply 1y

SH Kim

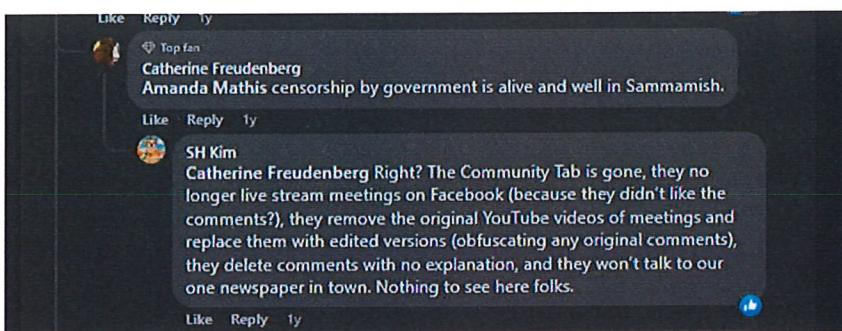
**City of Sammamish - Government** That is against the law. It was not off topic, and even if it was, it was about the city. You are not allowed to censor. Your "rules" are illegal. Off topic would have been "Do you like Tom Brady?"

Again, this is a ridiculously poorly trained government social media team. From inciting panic about ballots to censorship, you need to get yourselves trained.... like yesterday.

Stop being opaque and trying to get people to email you. Answer people when they ask you HERE. It's about transparency.

Like Reply 1y Edited

In the same thread Kimsey again falsely accuses the communications team of deleting comments and removing videos: *See Exhibit 10.*



Like Reply 1y

Top fan

**Catherine Freudenberg**

Amanda Mathis censorship by government is alive and well in Sammamish.

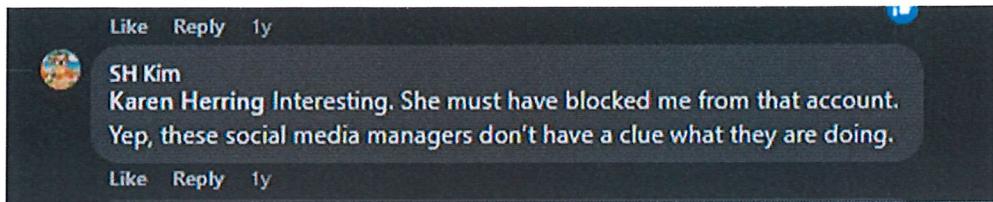
Like Reply 1y

SH Kim

**Catherine Freudenberg** Right? The Community Tab is gone, they no longer live stream meetings on Facebook (because they didn't like the comments?), they remove the original YouTube videos of meetings and replace them with edited versions (obfuscating any original comments), they delete comments with no explanation, and they won't talk to our one newspaper in town. Nothing to see here folks.

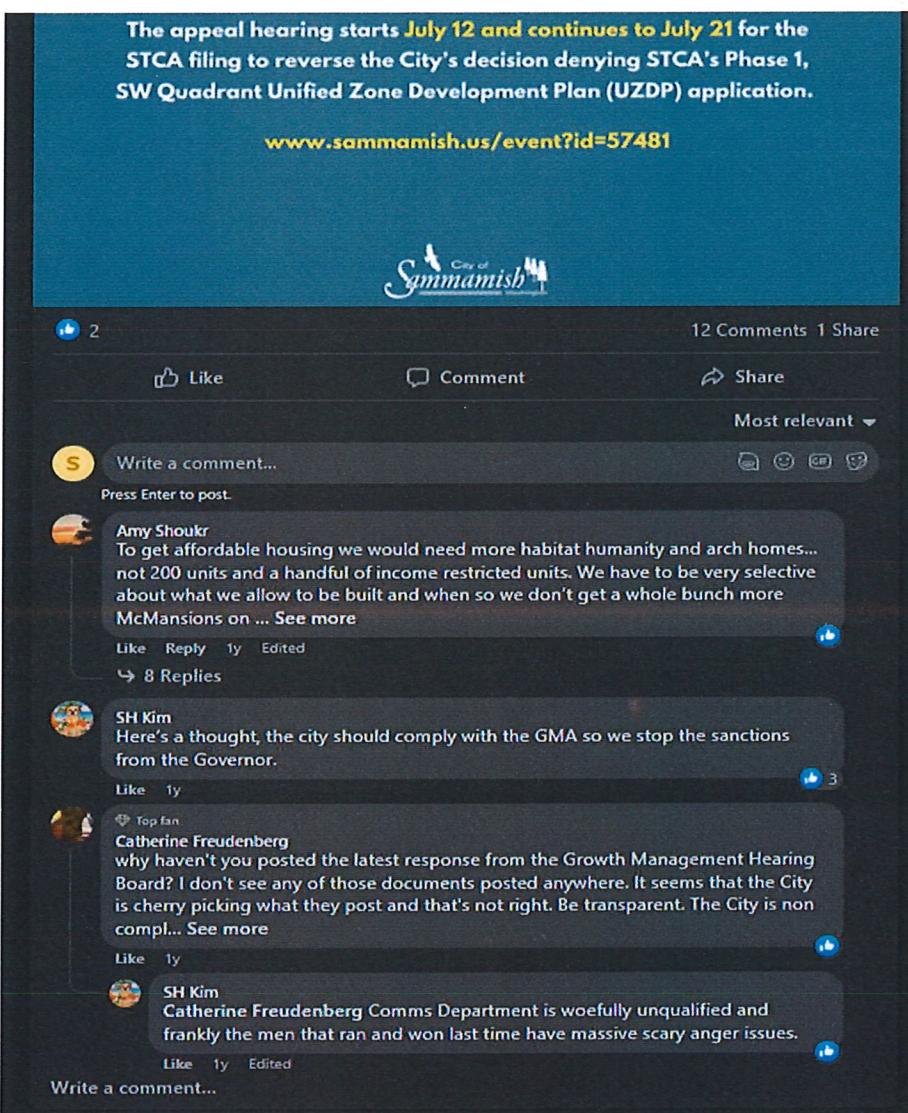
Like Reply 1y

And in the same thread, Kimsey again defames Wu and the team as public servants: *Exhibit 11.*



July 9, 2021

Kimsey called us “woefully unqualified) on the City of Sammamish’s Facebook page. **Exhibit 12.**



Kimsey’s false accusations that I deleted comments resulted in a former City Council member and former Mayor, Tom Odell, implying the same to the investigation on

Wu v. Kimsey  
Page 15

former City Manager Rudat. The email that Odell wrote to the investigator was part of a public records request that was made public across Sammamish social media sites, which is how I found out: **Exhibit 13**.

RE: Sammamish Investigation - Initial Leads

 thomas.todell@comcast.net To: Katherine F. Weber  
You forwarded this message on 5/25/2022 7:54 AM.

From: [thomas.todell@comcast.net](mailto:thomas.todell@comcast.net) [mailto:[thomas.todell@comcast.net](mailto:thomas.todell@comcast.net)]  
Sent: Friday, June 11, 2021 4:31 PM  
To: Katherine F. Weber [kweber@usleebest.com](mailto:kweber@usleebest.com)  
Subject: Sammamish Investigation - Initial Leads

**CONFIDENTIAL - ATTORNEY/CLIENT PRIVILEGED INFORMATION**

Hi Kathy –

I am using my personal e-mail to send you this additional information for security reasons. I will retain it for PRA purposes.

There are two other people that I recommend you speak with early in the course of your investigation:

1. Ms. Kate Langsdorf  
[Kate.Langsdorf@gmail.com](mailto:Kate.Langsdorf@gmail.com)  
240-883-4701

Her attorney and preferred contact person is:

Sara Amics  
Seattle Employment Law Partners  
206-699-1873

2. Scott Hamilton  
[cityhamilton@comcast.net](mailto:cityhamilton@comcast.net)  
206-819-9600

RE: Sammamish Investigation - Initial Leads

 thomas.todell@comcast.net To: Katherine F. Weber  
You forwarded this message on 5/25/2022 7:54 AM.

**Kate Langsdorf**

Kate is a former client of my daughter who was placed in a contract position in the Communications department of the City of Sammamish around two years ago while my daughter was working as a recruiter for Creative Circle, a recruiting and employment agency specializing primarily in the tech area but also communications. I am told that Kate witnessed another city employee deleting public comments critical to the city from the city server and reported it to the city's HR department as a violation of the state's records laws. Approximately a week or so later Kate had her contract terminated despite having immediately prior to this incident having been in discussions with the city for a permanent position. The person that Kate reported is a close friend of the City Manager's daughter. After Kate was let go her position was filled by someone who was also a friend of the CM's daughter and who reportedly is also her neighbor. Kate's successor did not go through any sort of competitive application process.

Kate has secured an attorney to help her with this issue and apparently may be considering taking legal action. She and my daughter have remained in occasional contact via Facebook and the circumstances of Kate's departure from the City came to her knowledge as a result of follow-up on Kate's abrupt dismissal.

**Scott Hamilton**

Scott is an aviation industry consultant and blogger by profession. He also served on the initial citizen Planning Advisory Board for the City of Sammamish and then continued on for several years as a member of the Planning Commission. Scott also was the founder and original editor of *The Sammamish Comment*. This blog began concurrently with the demise of any local newsprint coverage for Sammamish and became one of the most widely reported blogs about things happening at city hall. While having somewhat of a political bent at times the coverage was generally non-partisan and factual. They did deep dives into subjects of interest to the community and their reports were generally right on. Scott moved to Bainbridge Island a few years ago but has remained well connected with Sammamish. At the time he moved, he recruited and then turned *The Comment* over to Miki Mulfur. Scott probably knows as much about the subject of your investigation as Miki as the two have continued to collaborate.

There have been several other city employees who have left within the last several months under circumstances which may be worth looking into although I have little direct knowledge of the reason. If you think it might be useful I can try to put a list together, perhaps with the help of other Councilmembers.

Finally, I called you yesterday afternoon after having received a call from Miki Mulfur in which he told me that the two of you had made contact and that he had sent you the data file associated with the NDA that is the same one that he sent to me. I would like to give you the access password but want to do so orally so please give me a call at your convenience.

Best regards,

**Exhibit 14.**

Here are some more screenshots where Kimsey denigrates the Communications team as “very inexperienced” and “Trumpian.” I believe these were made on the 45th District Democrats Facebook page. **See Exhibit 15**



Sarah Hawes Kimsey  
[REDACTED] It is very inexperienced people  
driving the Communications helm who also  
have questionable motives.

Like · Reply · Award · 49w · Edited

1



Sarah Hawes Kimsey  
[REDACTED] You will likely get it by Monday.  
The city's communications team is a group  
with strong ties to the Rudat family and  
Trumpian politics. They are repeating rumors  
and that is irresponsible.

Like · Reply · Award · 49w

October 17, 2020 Kimsey buys advertising on Facebook to spread a post where she calls Celia Wu, “grossly incompetent” Exhibit 16:



I Love Sammamish

Yesterday at 5:27 PM ·

...

The unconscionable damage the grossly incompetent Communications Manager at City Hall just did to confidence in our election system was reckless and irresponsible. Way to undermine democracy, folks.

On the official City of Sammamish page they posted today that "Sammamish PD have also been called to investigate bags of ballots discovered by roadsides and ditches."

When what Sammamish PD had stated on their official page that "bags of mail including ballots" were discovered.

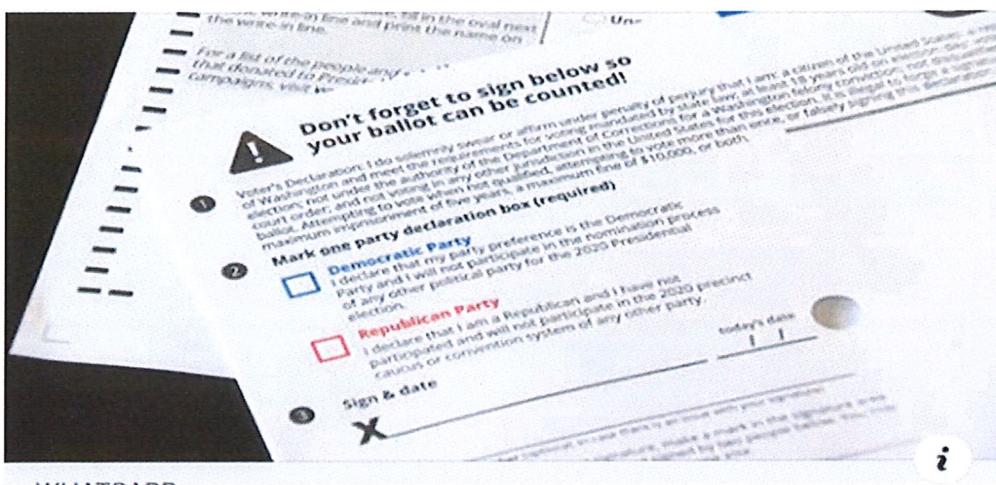
Two VERY different things.

If you do not receive your ballot by October 19th call King County Elections at 206-296-VOTE or go online to: [kingcounty.gov/elections/obmp](http://kingcounty.gov/elections/obmp).

###

"There is no evidence to support that this was politically motivated, or that ballots were specifically targeted. Sammamish is an area where we have frequent mail and package thefts," Sammamish police said.

<https://www.facebook.com/112779115408517/posts/3960891420597248/?extid=0&d=n>



We set forth above the oral and written statements and meanings attributed to you which you must immediately correct or be subject to the consequences of RCW 7.96.010 et. seq. for Failure to Correct Defamation.

To obtain the benefits of RCW 7.96 you must write a retraction and correction of each item, clearly and unambiguously retracting the false or defamatory content and

meaning of each statement; and you must cause no further defamatory statements or meaning to be conveyed; and you must communicate each retraction to each recipient of each statement.

Further you must provide to the undersigned on behalf of Ms. Wu, copies of all retractions and corrections with evidence of delivery to each recipient within **30** days of receipt of this letter.

Sincerely,

A handwritten signature in blue ink that reads "Mary Ruth Mann". The signature is fluid and cursive, with "Mary" on the first line and "Ruth Mann" on the second line.

Mary Ruth Mann  
James Kytle  
Enclosure: Exhibits As noted

1 HON. MARSHA J. PECHMAN  
2  
3  
4  
5  
6  
7

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

8 SARAH HAWES KIMSEY; TARUL KODE  
9 TRIPATHI; and CATHERINE  
FREUDENBERG,

10 Plaintiffs,

11 v.  
12 CITY OF SAMMAMISH, a municipal  
13 corporation; and CELIA WU, an individual,

14 Defendants.

15  
16 CASE NO. 2:21-cv-01264 MJP

**17 DECLARATION OF ROBERT  
18 SYDNOR**

19 I, Robert Sydnor, declare as follows:

20 1. I am the Chief Operating Officer at ArchiveSocial and make this declaration based  
21 on my personal knowledge.

22 2. ArchiveSocial is a cloud-based archiving and analytics company. We work with  
23 public sector customers to automatically capture and preserve comments and other data on a  
24 variety of social media websites. We work with the City of Sammamish to preserve the comments  
25 and posts on the City's official Facebook page.

26 3. ArchiveSocial uses a computer program to read the data from the City's Facebook  
page. The program preserves comments posted on the City's Facebook page immediately after  
they are posted. The program periodically attempts to access known comments to ascertain  
whether they have been hidden, edited, or deleted, applying an associated "tag" to the comment.

27 DECLARATION OF ROBERT SYDNOR - 1  
28 CASE NO. 2:21-cv-01264 MJP

29  
30 SUMMIT LAW GROUP, PLLC  
31 315 FIFTH AVENUE SOUTH, SUITE 1000  
32 SEATTLE, WASHINGTON 98104-2682  
33 Telephone: (206) 676-7000  
34 Fax: (206) 676-7001

1 4. [REDACTED]

2 [REDACTED]

3 [REDACTED] A “deleted” tag does not necessarily mean that the comment was actually deleted. [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 5. [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 6. If a comment is deleted from Facebook, it is not possible for the program to

16 determine who was responsible for deleting the comment. Per Facebook’s Help Center, when a

17 comment is deleted on Facebook, it is also deleted from their servers and backup systems so that it

18 cannot be retrieved.

19 See [https://www.facebook.com/help/121995105053180?helpref=search&query=recover%20delete%20post&search\\_session\\_id=7be4b79314e2473855db7de29f5fdb88&sr=3](https://www.facebook.com/help/121995105053180?helpref=search&query=recover%20delete%20post&search_session_id=7be4b79314e2473855db7de29f5fdb88&sr=3).

20 7. I have reviewed our records of all of the comments posted by Sarah Kimsey on the

21 City of Sammamish’s Facebook page. Nearly all of these comments were tagged as “deleted” by

22 our program at approximately the same time. This fact suggests to me that Ms. Kimsey’s privacy

23 settings were changed, or her account was disabled at some time so as to make her comments

24 inaccessible to the public, resulting in the program tagging all of her prior comments on the City’s

25 Facebook page as “deleted.”

1       8. I have reviewed screenshots of the City's Facebook page and understand that, with  
2 few exceptions, all of Ms. Kimsey's comments remain accessible to the public. The time stamps  
3 on these comments as visible today matches the original date and time of posting as recorded by  
4 our program. This further suggests that Ms. Kimsey's comments were never actually deleted from  
5 Facebook, but that the "deleted" tags were applied for some other reason, as discussed above.

6       I declare under penalty of perjury under the laws of the State of Washington that the  
7 foregoing statements are true and correct.

8       EXECUTED on October 27th, 2021, at Durham, North Carolina.

9  
10      \_\_\_\_\_  
11      Robert Sydnor